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15 NOVO NORDISK INC.

16 **UNITED STATES DISTRICT COURT**
17 **SOUTHERN DISTRICT OF CALIFORNIA**
18

19 In re: INCRETIN-BASED
20 THERAPIES PRODUCTS
LIABILITY LITIGATION

21 **AS TO ALL CASES IDENTIFIED**
22 **IN PARAGRAPH 1**
23

Case No. 3:13-md-02452-AJB-MDD

**JOINT MOTION FOR EXTENSION
OF TIME TO RESPOND TO
PLAINTIFFS' COMPLAINTS**

Judge: Hon. Anthony J. Battaglia
Magistrate: Hon. Mitchell D. Dembin

Pursuant to Rules 7.5 and 12.1 of the Local Rules for the United States District Court for the Southern District of California, Plaintiffs in the cases listed in Paragraph 1 (“Plaintiffs”) and Defendant Novo Nordisk Inc. (“NNI”), by and through their undersigned counsel, move as follows:

1. The actions subject to this motion are:

- a. *Gerald Marsh, Individually and as Successor-in-Interest of the Estate of Elizabeth Marsh, Deceased v. Novo Nordisk Inc., et al.*, Case No. 3:13-cv-02413-AJB-MDD (S.D. Cal.);
- b. *Marie Swenson v. Novo Nordisk Inc., et al.*, Case No. 3:13-cv-02404-AJB-MDD (S.D. Cal.);
- c. *Francis Yanok, Individually and as Successor-in-Interest of the Estate of Linda Yanok, Deceased v. Novo Nordisk Inc.*, Case No. 3:13-cv-02414-AJB-MDD (S.D. Cal.).

2. Plaintiffs have filed claims against NNI in the cases listed in Paragraph 1. NNI has not yet served a responsive pleading to Plaintiffs’ Complaints.

3. By Order of October 18, 2013, the Court instructed Plaintiffs to submit a Master Consolidated Complaint by November 18, 2013. *See* Doc. No. 143, ¶ 2.

4. If an agreed Master Consolidated Complaint is submitted by November 18, 2013, NNI and other Defendants in this MDL must submit a Master Answer no later than December 18, 2013.

5. In light of efforts to establish a system for a Master Consolidated Complaint and a Master Answer, Plaintiffs and NNI agree that it is appropriate to extend NNI’s deadline to serve its responsive pleading to Plaintiffs’ Complaints until and including December 30, 2013.

1 Accordingly, Plaintiffs and NNI hereby move the Court to grant NNI an
2 extension of time within which to file and serve its responsive pleading to
3 Plaintiffs' Complaints, so that NNI shall respond on or before December 30, 2013.

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5 Dated: November 6, 2013

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/s/ Raymond M. Williams

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